

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

NEONODE SMARTPHONE LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO. LTD, and  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

Civil Action No. 6:20-cv-00507-ADA

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION TO STAY THIS ACTION PENDING  
DECISION ON APPLE’S MOTION TO TRANSFER VENUE**

Defendants Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc. (collectively “Samsung”) respectfully move for a stay pending a decision on Apple’s pending Motion to Transfer Venue to the Northern District of California.

This case is coordinated for pretrial activities with the Neonode v. Apple case (Case No. 6:20-cv-00505). Apple has moved to transfer its case against Neonode to the Northern District of California. Samsung is informed and believes that Neonode and Apple have agreed to stay activity in that case unrelated to transfer until the Court decides Apple’s pending Motion to Transfer. To promote efficiency and in an attempt to keep these two coordinated cases on the same schedule to Markman, Samsung has requested to also stay this case pending the Court’s decision on Apple’s Motion to Transfer. Neonode does not oppose Samsung’s request.

For the foregoing reasons, Samsung requests that the Court stay this case pending a decision on Apple’s Motion to Transfer Venue.

Respectfully submitted,

Dated: December 7, 2020

/s/ John M. Guaragna

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AMERICA, INC.

**CERTIFICATE OF CONFERENCE**

I hereby certify that the undersigned counsel for Defendants conferred with Plaintiff's counsel. Plaintiff does not oppose Defendants' request sought in this motion.

/s/ John M. Guaragna  
John M. Guaragna

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 7th day of December 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(b)(1). Any other counsel of record will be served by a facsimile transmission and/or first class mail.

/s/ John M. Guaragna  
John M. Guaragna